



4C System Update 9

04 March 2021

1. Remote audit guidance
2. Clarification: Possibility of merging audits

1. Remote audit guidance

The overall objective of remote audits is to achieve the same level of assurance as the on-site audits, and this goal can be achieved combining remote audits with complementary on-site auditing.

A remote audit can be applied to any type of 4C audit, be it for 4C Units or for chain of custody certification, provided that the following general conditions are met:

- On-site visit and physical meeting between CB and auditee (Managing Entity (ME), Business Partners (BPs), Intermediary Buyer (IB), Final Buyer (FB)) is not possible due to force majeure circumstances, such as a pandemic and other reasons as listed in the 4C System Regulations, Chapters 3.6 and 3.8, and this can be verified by official restriction/warning documents.
- Information and Communication Technology (ICT¹) is available and auditee and CB are familiar with the ICT and know how to operate it.
- The security and reliability of data and information provided in remote audit must be ensured.
- For 4C Units, the requirement regarding auditing during the harvest season remains valid as described in the 4C System Regulations, Chapter 6.1.
- A complementary on-site audit must be conducted as soon as the safety constraints or travel restrictions are no longer occurring, i.e. an on-site surveillance audit to verify what was not feasible to cover remotely or verify again check-points that could not be properly evidenced during the remote audit (e.g. visual inspections and interviews).
- In case a remote audit was conducted before this System Update is published the complementary on-site audit must take place within 12 months from the last day of the respective audit.

¹ Information and communications technology (ICT): combination telecommunication and computer, as well as necessary software, storage and audiovisual resources, that enable users to access, store and transmit information (e.g. fixed phone lines, speakers, mobile or internet connection, mobile cameras, tablets, drones, Zoom meeting, Skype, Teams, applications for smartphones or other types of cameras that take geo-referenced pictures, remote sensing images, etc).





Besides the general conditions described in the previous item, the following requirements related to the certification process must be considered.

- Application for a 4C audit:
 - Documented mutual agreement between CB and auditee on applying remote audit must be in place prior to the audit plan registration.
 - In case of initial certification, a remote audit can only be conducted when the risk assessment results in low risk level. For 4C Units, this requirement also applies for both types of Business Partners (BP), i.e. BP Producers and BP Service Providers as described in the 4C System Regulations, Chapter 7. An additional risk to be considered refers to the availability and accessibility of documents to be shared with the CB before the audit (e.g. documented internal management system, procedures describing management of the traceability system, list of pesticides used in the 4C Unit and any other document required to achieve the first level of compliance, as described in the audit checklist).

- Audit plan preparation and communication
 - The exchange of documents between CB and auditee before the remote audit is crucial and significantly greater when compared to on-site audit. The CB must therefore consider sufficient and realistic deadlines both for the auditee to make the documentation available to the CB and for the CB to assess them.
 - The complete sample of BPs can be remotely audited. It is also possible to split the sample, i.e. part in the remote audit and part in the required on-site audit. However, the total sample size cannot be less than the minimum sample size calculated based on regular risk assessment applied for on-site audits.
 - The disclosure of the names of the selected BPs to be audited must follow the requirement described in the 4C System Regulations, Chapter 6.4. Exceptions to this rule must be communicated to 4C in advance for approval before implementation.

- Conducting a remote audit
 - The basic steps of a remote audit must follow the same process of a regular on-site audit, e.g. opening meeting, verification of documents, visual inspection of fields and facilities, interviews, reporting the non-conformities identified, closing meeting.
 - All checkpoints where the guidelines indicate “on-site inspection” must be visual inspected during the remote audit through the use of ICT resources mentioned above.
 - In addition to documentation, recorded evidence (e.g. videos or images with date and time) must also be archived in accordance with the 4C System Regulations on document management and integrity program.





- Further information on the steps can be found in the updated 4C Certification and 4C CoC certification Step-by-Step documents [here](#).

For additional guidelines to this document, please refer to the document “ISO 9001 Auditing Practices Group - Guidance on Remote Audits”.

2. Clarification of combining audits

We would like to clarify that in order to save resources, it is possible to merge different audits/events (e.g. surveillance audit, addendum audit, Annual Updates), as long as all requirements for the different types of audits/events are met as specified in the 4C System Regulations.

Example 1: If a 4C Unit is requested to be audited through a surveillance audit in May 2021 and the Annual Update 1 (AU1) is due on August 2021, it is possible to ask the CB to merge both events into one audit. To do so, the ME shall provide the responsible CB with the updated Business Partner Map (BPM) and Improvement Plan (IP) for both events, at the time of submitting the surveillance audit application. In order to be accepted for the AU1 evaluation, the IP must have been updated accordingly, including the status of implementation as required after one year and the description of next steps to be implemented until AU2. This includes, that the CB must at this moment also evaluate those check-points which must be met at AU1 in case NCs to them were identified in the previous certification audit. Please be aware that the BPM and IP would be required to be uploaded twice into the 4C portal, once under the surveillance audit process and once under the AU1 evaluation process.

Example 2: If a surveillance audit is due and the certificate holder (ME, IB or FB) wishes to include more BPs through an addendum audit, both audits can be conducted at the same time and can be registered as one process in the 4C portal, selecting the option “surveillance & addendum audit”. One audit checklist and one BPM can be uploaded for both audits, but it must be clear via the BPM that the requirements of sample calculation and selection for both audit types have been met, that individual risk assessments have taken place and all processes must be documented and managed at the CB office as required by 4C. The requirement of IP amendment after each audit remains valid as described in the 4C System Regulations, Chapter 4.3.3. In this case, the amendment shall be based on the results of the two audits conducted at the same time.

